

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 04 CV 10746 JLT

IVAN SANTIAGO,
Plaintiff

v.

WILLIAM J. FEENEY, MARCUS
EDDINGS, and the CITY OF BOSTON,
Defendants

**DEFENDANT WILLIAM FEENEY'S
MOTION TO EXTEND TIME TO FILE A RESPONSIVE PLEADING**

Now comes the Defendant William Feeney and respectfully move this Honorable Court, pursuant to Fed. R. Civ. P. 6(b), for an enlargement of time to file his response to the Plaintiff's Complaint, from June 15, 2004 to July 6, 2004. This Motion has been assented to by the Plaintiff, by and through his attorney, Stephen Hrones.

As grounds for his motion, the Defendant states:

1. A request for representation of Defendant is still pending.¹
2. The Defendant requires additional time to investigate and to draft an appropriate response to Plaintiff's Complaint.
3. Permitting additional time to file a responsive pleading to the Plaintiff's Complaint furthers the interests of justice.
4. Allowing this motion will not prejudice any party to the action.

WHEREFORE: The Defendant William Feeney respectfully requests this Honorable Court allow his motion to extend time to file a responsive pleading, and set the date for responsive pleading to be due on or before **July 6, 2004.**

¹ Below-signed counsel makes a limited appearance for purposes of this Motion only; authority to represent Defendant William Feeney for the remainder of this action is still pending and is the impetus for this Motion.

Respectfully submitted,

DEFENDANT, WILLIAM FEEENEY
Merita A. Hopkins
Corporation Counsel
By his attorney,

S/Stephen G. Cox

Stephen G. Cox
Assistant Corporation Counsel
BBO# 566943
City of Boston Law Department
Room 615, Boston City Hall
Boston, Massachusetts 02201
(617) 635-4064

CERTIFICATION PURSUANT TO LOCAL RULE 7.1(A)(2)

I hereby certify that I have conferred with counsel for the Plaintiff in the above-entitled action in a good faith attempt to resolve or narrow the issues raised by the instant motion, and that Attorney Hrones has ASSENTED TO the Defendant's *Motion To Extend Time To File A Responsive Pleading*.

S/Stephen G. Cox

Stephen G. Cox